

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In re:)	Chapter 11
)	Bankruptcy No. 19-35576
RQW Real Estate Holdings, LLC, et al.,)	Jointly Administered
)	Honorable Deborah K. Thorne
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RQW Real Estate Holdings, LLC,)	
RQW Automotive Services, LLC, and)	
Eric Quick,)	Adversary No. 21-00061
)	
Plaintiff,)	
v.)	
)	
Wilkie Holdings, Inc.)	
Defendant.)	

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on May 20, 2021 at 9:30 a.m., I will appear before the Honorable Judge Thorne, or any judge sitting in that judge's place, and present the motion of Defendant, Wilkie Holdings, Inc., to extend time, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this linke: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-2-5252 or 1-646-9=828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 160 9362 1728 and the password is No passcode required. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

WILKIE HOLDINGS, INC.

By: /s/ George A Thomas
Attorney for Defendant

CERTIFICATE OF SERVICE

I, Teresa L. Einarson, an attorney, certify that on May 13, 2021, I served a copy of this notice and the attached motion on each entity shown on the following list via the method stated therein.

VIA ECF TO:

William J. Factor
FactorLaw
105 W. Madison Street, Suite 1500
Chicago, IL 60602
Email: wfactor@wfactorlaw.com

/s/ Teresa L Einarson

George A. Thomas (3122971)
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<hr/> RQW Real Estate Holdings, LLC,)	
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Plaintiffs,)	
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)	
Wilkie Holdings, Inc.)	
Defendant.)	

MOTION TO EXTEND TIME

Defendant, Wilkie Holdings, Inc., by its attorneys, Thomas & Einarson, Ltd., states the following in support of its motion to extend the time within which it must answer or otherwise respond by motion to the Adversary Complaint.

1.) On April 14, 2021, Plaintiffs filed their Adversary Complaint against Wilkie Holdings, Inc. and issued summons.

2.) Docket Entry No. 3 dated April 15, 2021 reflects Summons Service was executed on Wilkie Holdings, Inc. by first class mail.

3.) Pursuant to Bankruptcy Rule 7012, Defendant is required to file a motion or answer to the Complaint by May 14, 2021 (within 30 days of issuance).

3.) On May 13, 2021, Defendant retained the law firm of Thomas & Einarson, Ltd. to represent it in the defense of this Adversary Proceeding.

4.) To properly answer or otherwise respond by motion to the Complaint, Defendant's attorneys must review the details of this chapter 11 proceeding; perform a complete review of the

proceedings in DuPage County Case number 2018CH791; and, review the underlying organizational documents of the debtor LLCs.

5.) For this reason, the Defendant requests an additional 28 days, from May 14, 2021 up to and including June 11, 2021, to file its answer or motion to the Adversary Complaint.

WHEREFORE, Defendant, Wilkie Holdings, Inc., respectfully requests that this Court enter an order extending the time within which it must answer or otherwise respond to the Adversary Complaint from May 14, 2021 to and including June 11, 2021, and for any further relief this Court deems just and appropriate.

WILKIE HOLDINGS, INC.

By: /s/ George A Thomas

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